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Attorneys for Defendants

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, CENTRAL DIVISION**

GLOBAL FREIGHT SYSTEMS CO. W.L.L.;
GAMA CENTER; and GENOA PLASTIC
INDUSTRIES,

Plaintiffs,

vs.

AL-MORRELL DEVELOPMENT, L.L.C. and
PAUL A. MORRELL,

Defendants.

**DEFENDANTS' PRETRIAL
DISCLOSURES PURSUANT TO FED. R.
CIV. P. 26(a)(3)**

Case No. 1:14-cv-00133-TC
Honorable Tena Campbell

Pursuant to Federal Rule of Civil Procedure 26(a)(3), Defendants Al-Morrell Development, LLC ("AMD"), and Paul A. Morrell (collectively "Defendants") make the following pretrial disclosures:

I. WITNESSES DEFENDANTS EXPECT TO PRESENT

1. Paul A. Morrell

II. WITNESSES DEFENDANTS MAY CALL IF THE NEED ARISES

1. Martin F. Petersen
2. Anthony Dsouza

III. DOCUMENTS OR OTHER EXHIBITS DEFENDANTS EXPECT TO OFFER

1. Assets Sale Agreement (AMD 0022 to AMD 0025);
2. E-mail chain dated December 31, 2011 (AMD 0012 to AMD 0015);
3. E-mail from Tolly J. DiCosmo to Alan Morrell and others dated May 27, 2011 (AMD 0005);
4. Service Provider Agreement between AMD and Global Freight; and
5. AMD Transaction Detail by Account January through June 2012 (AMD 0183).

IV. DOCUMENTS OR OTHER EXHIBITS MAY OFFER IF THE NEED ARISES

1. E-mail from Paul Morrell to Phil Morrell dated November 6, 2011 (AMD 0009 to AMD 0011);
2. E-mail from Paul Morrell to Tolly DiCosmo dated January 6, 2012 (AMD 0018);
3. E-mail from Paul Nelson to Anthony Dsouza dated August 10, 2012 (Deposition Exhibit 23);
4. E-mail from Alan Morrell to mohanj@global-freight.net dated November 12, 2012 (Deposition Exhibit 24);
5. Western Union Wire Transfer and Invoices dated December 12, 2011 (AMD 0042 to AMD 0059);
6. Western Union Wire Transfer and Invoices dated November 2, 2011 (AMD 0060 to AMD 0063);

7. Western Union Wire Transfer and Invoices dated October 26, 2011 (AMD 0072 to AMD 0087);
8. Western Union Wire Transfer and Invoices dated October 13, 2011 (AMD 0088 to AMD 0097);
9. Western Union Wire Transfer and Invoices dated September 30, 2011 (AMD 0098 to AMD 0117);
10. Western Union Wire Transfer and Invoices dated September 19, 2011 (AMD 0118 to AMD 0146);
11. Western Union Wire Transfer and Invoices dated August 30, 2011 (AMD 0147 to AMD 0177);
12. 30(b)(6) Deposition of Al-Morrell Development, LLC, through: Matin F. Petersen;
13. 30(b)(6) Deposition of Global Freight Systems through Anthony Dsouza; and
14. Deposition of Paul Morrell.

DATED this 4th day of March, 2016.

HILLYARD, ANDERSON & OLSEN, P.C.

/s/ R. Christian Hansen
Gary N. Anderson
R. Christian Hansen
Attorneys for Defendants

CERTIFICATE OF SERVICE

The undersigned hereby certifies that DEFENDANTS' PRETRIAL DISCLOSURES were sent via e-mail to the following individuals on the 4th day of March, 2016:

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